

Mr. Joe Virgil
The Levy Co., Inc.
P.O. Box 540
Portage, IN 46368

Dear Mr. Virgil:

Re: Exempt Construction and Operation Status,
089-14295-00133

The application from The Levy Co., Inc., received on April 26, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following to be located at One North Buchanan, Gary, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) parts washer unit, identified as unit 3, with a maximum capacity of 0.1 gallon evaporation rate per day;
- (b) One (1) parts washer unit, identified as unit 4, with a maximum capacity of 0.1 gallon evaporation rate per day.

The following conditions shall be applicable:

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

This existing source submitted their Part 70 T089-7719-00133 application on December 13, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 Permit application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief

Levy- Indiana Slag
of 2
Gary, Indiana
14295-00133
Permit Reviewer: Gail McGarrity

Page 2

Exemption 089-

Permits Branch
Office of Air Quality

gmm

cc: File - Lake County
Lake County Health Department
Air Compliance - Bob Simmons
Northwest Regional Office
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak
City of Gary Environmental Affairs Department
Part 70 Application File - T-089-7719-00133

**Indiana Department of Environmental Management
Office of Air Quality
and City of Gary Environmental Affairs Department**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Levy -Indiana Slag Company, Inc.- contractor of US Steel - Gary Works
Source Location: I North Buchanan, Gary , Indiana 46401
County: Lake
SIC Code: 3295
Exemption Permit No.:089-14295-00133
Permit Reviewer: Gail McGarrity

The Office of Air Quality (OAQ) has reviewed an exemption application from Levy - Indiana Slag Company, Inc.. relating to the construction and operation of two (2) parts washer units.

- (a) One (1) parts washer, identified as unit 3, with a maximum capacity of 0.1 gallon evaporation rate per day.
- (b) One (1) parts washer, identified as unit 4, with a maximum capacity of 0.1 gallon evaporation rate per day.

Source Definition

This stationary slag processing plant is an on-site contractor :

- (a) US Steel - Gary Works, 089-00121, the primary operation, is located at One North Broadway , Gary Indiana; and
- (b) Levy - Indiana Slag Company, Inc., 089-00133, the supporting operation, is located at One North Buchanan , Gary, Indiana.

IDEM has determined that US Steel - Gary Works and Levy -Indiana Slag Company, Inc. are located contiguous to each other , belong to the same industrial grouping and Levy- Indiana Slag Company, Inc. supports US Steel - Gary Works. These two plants are considered one source. Therefore, the term “source” in the Exemption documents refers to both US Steel - Gary Works and Levy -Indiana Slag Company, Inc. as one source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the exemption be approved. This recommendation

is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on May 1, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations on page one (1).

Potential To Emit of the Levy - Indiana Slag Co., Inc. -Parts Washer Units

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	0.19
CO	0.0
NO _x	0.0

Pursuant to 326 IAC 2-1.1-3 (D) the potential to emit VOCs without controls is less than 10 tons year, therefore these parts washer units are exempt.

The source is located in Lake County.

Pollutant	Status
PM-10	nonattainment
SO ₂	nonattainment
NO ₂	nonattainment
Ozone	nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Local Agency
Based on the initial location of this source, the City of Gary Environmental Affairs

Department shall be contacted for additional air operating requirements. OAQ has the authority to issue this construction permit.

Source Status

This existing source is a major stationary source because it is in one of the 28 listed source categories and at least one regulated pollutant is emitted at a rate of 100 tons or more per year.

Proposed Modification

PTE from the proposed modification (based on 8760 hours of operation per year at the rated capacity):

Pollutant	PM Tons/yr	PM10 Tons/yr	SO2 Tons/y r	VOC Tons/yr	CO Tons/yr	NOx Tons/yr
Parts Washer Units	0.0	0.0	0.0	0.36	0.0	0.0
Net Emissions	0.0	0.0	0.0	0.36	0.0	0.0
De minimus Emissions levels	4.56	4.56	2.73	2.73	4.56	2.73
PSD or Offset Significant Level	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the emissions increase is less than the De minimus and Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3 the Emissions Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T089-7719-00133) application on December 13, 1996. The equipment being reviewed under this exemption shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the parts washer units.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to the parts washer units..

State Rule Applicability - Individual Facilities

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Construction Permit Application Form Y.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of these two parts washer units shall be subject to the conditions of the attached proposed **Exemption Permit 089-14295-00133**.

**Appendix A: Emissions Calculations
Degreasing Operations**

Company Name:	Levy -Indiana Slag Company
Address City IN Zip:	One North Broadway, Gary, Indiana 46402
CP:	089-14295
Pit ID:	089-00133
Reviewer:	Gail McGarrity
Date:	5-7-2001

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gallon Evaporation (Gal/day)	Potential VOC pounds per day	Potential VOC tons per year
Mineral Spirits	7.1	100.00%	28.5%	71.5%	28.5%	0.10	0.51	0.09

0.51

0.09

For 1 unit

State Potential Emissions

0.19

For 2 units

METHODOLOGY

Potential VOC Pounds per Day = Pounds of VOC per Gallon (lb/gal) * weight % organics * Gal evap (gal/day)

Potential VOC Tons per Year = Pounds of VOC per day (lb/day) * (365 days/yr) * (1 ton/2000 lbs)